

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC D/B/A	§	
BRAZOS LICENSING AND	§	CIVIL ACTION 6:20-cv-00980-ADA
DEVELOPMENT,	§	CIVIL ACTION 6:20-cv-00981-ADA
<i>Plaintiff,</i>	§	CIVIL ACTION 6:20-cv-00982-ADA
	§	
v.	§	
	§	
CANON, INC.,	§	
<i>Defendant.</i>	§	
	§	

**DECLARATION OF JONATHAN K. WALDROP IN SUPPORT
OF PLAINTIFF WSOU INVESTMENTS, LLC'S
SUR-REPLY CLAIM CONSTRUCTION BRIEF**

I, Jonathan K. Waldrop, declare as follows:

1. I am a Partner with the law firm of Kasowitz Benson Torres LLP and am one of the attorneys responsible for the representation of Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“WSOU” or “Plaintiff”) in this matter. I make this declaration in support of Plaintiff’s Sur-reply Claim Construction Brief.

2. If called to testify under oath in court, I could and would testify competently to the facts stated herein.

3. Attached hereto as Exhibit 1 is a true and correct copy of the U.S. Patent No. 7,054,346, dated May 30, 2006 (“Balachandran et al.”) bearing production numbers WSOU-CANON-0000001 - WSOU-CANON-0000012.

4. Attached hereto as Exhibit 2 is a true and correct copy of the U.S. Patent No. 7,116,714, dated October 3, 2006 (“Hannuksela”) bearing production numbers WSOU-CANON-

0000358 - WSOU-CANON-0000374.

5. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the Transcript of Deposition of Dr. Zhi Ding, dated October 12, 2021.

6. Attached hereto as Exhibit 4 is a true and correct copy of the Request for Reconsideration, dated April 5, 2005, an excerpt from the file history of U.S. Patent No. 7,054,346 bearing production numbers WSOU-CANON-0000265 - WSOU-CANON-0000277.

7. Attached hereto as Exhibit 5 is a true and correct copy of the Notice of Allowability, dated December 15, 2005, an excerpt from the file history of U.S. Patent No. 7,054,346 bearing production numbers WSOU-CANON-0000341 - WSOU-CANON-0000353.

8. Attached hereto as Exhibit 6 is a true and correct copy of the Final rejection, dated September 30, 2005, an excerpt from the file history of U.S. Patent No. 7,116,714 bearing production numbers WSOU-CANON-0000558 - WSOU-CANON-0000566.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief, formed after reasonable inquiry under the circumstances.

Executed on the October 15, 2021 in San Mateo, California.

/s/ Jonathan K. Waldrop
Jonathan K. Waldrop